

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

MWK RECRUITING, INC.

Plaintiff,

v.

EVAN P. JOWERS, YULIYA

**VINOKUROVA, ALEJANDRO VARGAS,
and LEGIS VENTURES (HK) COMPANY
LIMITED (aka Jowers / Vargas),**

Defendants.

Civil Action No. 1:18-cv-00444

EVAN P. JOWERS

Counterclaimant,

v.

**MWK RECRUITING, INC., ROBERT E.
KINNEY, MICHELLE W. KINNEY,
RECRUITING PARTNERS GP, INC.,
KINNEY RECRUITING LLC, COUNSEL
UNLIMITED LLC, and KINNEY
RECRUITING LIMITED**

Counter-defendants.

**DEFENDANTS' REQUEST FOR ENTRY OF JUDGMENT
AS TO PREVIOUSLY DISMISSED DEFENDANTS**

REQUEST FOR ENTRY OF JUDGMENT
AS TO PREVIOUSLY DISMISSED DEFENDANTS

On July 29, 2019 (Dkt. 87), the Court Ordered that Defendants Legis Ventures (HK) Corporation Limited (“Legis Ventures”), Alejandro Vargas (“Vargas”) and Yulia Vinokurova (“Vinokurova”) (the “Dismissed Defendants”) be dismissed from the case, ruling:

- “Plaintiff MWK’s claims against Defendants Legis Ventures and Vargas for misappropriation of trade secrets under the Federal Defend Trade Secrets Act and the Texas Uniform Trade Secrets Act and civil conspiracy are DISMISSED for lack of personal jurisdiction.”
- “Plaintiff MWK’s claims against Vinokurova for misappropriation of trade secrets under the Federal Defend Trade Secrets Act and the Texas Uniform Trade Secrets Act and breach of contract are DISMISSED for failure to state a claim upon which relief could be granted.”
- “Plaintiff MWK’s civil conspiracy claim is DISMISSED for failure to state a claim upon which relief could be granted.”

(Order Mot. Dismiss, Dkt. 87, at 30–31)

On June 16, 2020 (Dkt. 177), pursuant to Rule 54(b), Defendants sought entry of a final judgment as to Alejandros Vargas, Legis Ventures, and Yulia Vinokurova, and the dismissed claims for civil conspiracy. The Court declined to certify Jowers’ request for partial final judgement at that time, citing judicial economy in rendering a judgment as to these parties and claims until “after the district court renders its decision on the remaining claims or as to the remaining parties.” (Dkt. 229).

Now that the Court has rendered a judgment for Plaintiff, Defendants hereby request entry of judgment as to the dismissed parties and claims as detailed above and in the corresponding proposed order pursuant to Federal Rule of Civil Procedure 58.

DATED: September 23, 2022

Respectfully submitted,

By: /s/ Robert Tauler
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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that, on September 23, 2022, a true and accurate copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system.

/s/ Robert Tauler
Robert Tauler